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July 27, 2020

By ECF and Email

The Honorable Ann Donnelly
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *United States v. Lucio Celli, et al.*, 19 Cr. 127 (AMD)

Your Honor:

I represent Lucio Celli in the above-referenced case. I am writing to request a temporary modification of Mr. Celli's conditions of pretrial release to permit him to visit his friend Claudia Giordano, a retired schoolteacher and former colleague of Mr. Celli, on the afternoon of August 2, 2020. Ms. Giordano lives in White Plains, New York, which is approximately one hour by car from Mr. Celli's home. Because of a medical condition, which I disclosed to Pretrial Services, Ms. Giordano is not able to drive to Mr. Celli's residence. Mr. Celli intends to meet with Ms. Giordano on the lawn outside her apartment complex and maintain social distancing throughout their visit.

The government and pretrial services oppose this request. Mr. Bensing has informed me that, on July 22, 2020, Mr. Celli called her and left a voice message concerning my representation of him. Mr. Celli has expressed to me his understanding that the Court has instructed him not to call Ms. Bensing under any circumstances. I respectfully request that the Court grant this request for a temporary modification of Mr. Celli's conditions of release, notwithstanding his recent lapse of judgment, on the grounds that it would be psychologically beneficial to permit Mr. Celli to maintain social ties during his period of home detention.

Mr. Celli is presently subject to the following bail conditions: a \$150,000 secured bond co-signed by his parents; home detention with location monitoring; the surrender of his passport; no internet use; his parents' serving as third-party custodians; mental health treatment; drug testing and treatment as directed by pretrial; travel restrictions to the Eastern and Southern Districts of New York; no contact with any judges aside from court appearances; and pretrial supervision.

Respectfully,



Zachary S. Taylor

cc: AUSA Kayla Bensing